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33 Attorneys for Plaintiff FRANCISCA MORALEZ

34 UNITED STATES DISTRICT COURT

35 NORTHERN DISTRICT OF CALIFORNIA

36 FRANCISCA MORALEZ,

37 Plaintiff,

38 Case No. 3:12-cv-01072-CRB
39 [Complaint Filed March 2, 2012]
40 [Amended Complaint Filed May 10, 2012]

41 v.

42 WHOLE FOODS MARKET
43 CALIFORNIA, INC.; BOND CC
44 OAKLAND LLC; and DOES 1-10,
45 Inclusive

46 Defendants.

47 **JOINT STIPULATION TO EXTEND TIME
48 FOR PLAINTIFF TO FILE ATTORNEY FEE
49 APPLICATION**

50 (F.R.C.P. Rule 54)

WHEREAS, defendant made a FRCP Rule 68 offer of judgment on April 2, 2013(later amended), and plaintiff accepted it on April 15, 2013;

WHEREAS, the notice of acceptance of the Rule 68 offer of judgment will be filed concurrently with this stipulation;

WHEREAS, the offer of judgment specifically excluded any attorney fees and contemplated that plaintiff's counsel will make application to this Court to recover attorney fees, litigation expenses and costs;

THEREFORE, the parties stipulate and request the Court to set the following briefing schedule for plaintiff's counsel's application for attorney fees, litigation expenses and costs. Plaintiff's counsel shall file her application on or before May 31, 2013, defendants shall file their opposition on or before June 14, 2013, and plaintiff's counsel shall file her reply on or before June 21, 2013.

Respectfully submitted,

Dated: April 16, 2013

LAW OFFICES OF PAUL L. REIN

By /s/ Celia McGuinness
PAUL L. REIN
CELIA McGUINNESS
CATHERINE M. CABALO
Attorneys for Plaintiff
FRANCISCA MORALEZ

Dated: April 16, 2013

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Hayley S. Grunvald
RICHARD J. SIMMONS
DEREK R. HAVEL
HAYLEY S. GRUNVALD
Attorneys for Defendant BOND CC OAKLAND, LLC

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Hayley S. Grunvald, counsel for Defendant Bond CC Oakland and that I have obtained Ms. Grunvald's authorization to affix her electronic signature to this document.

6 | Dated: April 16, 2013

LAW OFFICES OF PAUL L. REIN

By /s/ Celia McGuinness
PAUL L. REIN
CELIA McGUINNESS
CATHERINE M. CABALO
Attorneys for Plaintiff FRANCISCA MORALEZ

ORDER

Having reviewed and considered the above Stipulation of the parties, and good cause appearing, the Court sets the following briefing schedule for plaintiff's counsel's application for attorney fees, litigation expenses and costs: Plaintiff's counsel shall file her application on or before May 31, 2013, defendant shall file their opposition on or before June 14, 2013, and plaintiff's counsel shall file her reply on or before June 21, 2013.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 25, 2013

